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GURMAN, KURTIS, BLASK & FREEDMAN

CHARTERED

SUITE 500
1400 SIXTEENTH STREET, N.W.
WASHINGTON, D.C. 20036

(202) 328-8200
TELECOPIER: (202) 462-1784

August 12, 1994

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

HAND DELIVERED

William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Stop Code 1170
Washington, D.C. 20554

Re: Ex Parte Presentation in
PR Docket No. 93-61

Dear Mr. Caton:

Pursuant to Section 1.1206(a)(1) of the Commission's Rules, I am filing the original and one copy of the enclosed written ex parte presentation in the above-referenced proceeding.

Please call me if you have any questions regarding this notice.

Respectfully submitted,

Louis Gurman
Louis Gurman

Enclosure

cc: Ralph A. Haller (By Hand)
Beverly G. Baker (By Hand)
F. Ronald Netro (By Hand)
Kent Y. Nakamura (By Hand)
Rosalind K. Allen (By Hand)
David Furth (By Hand)
Martin D. Liebman (By Hand)
Edward R. Jacobs (By Hand)
Bruce A. Franca (By Hand)
Richard B. Engelman (By Hand)
Ruth Milkman, Esquire (By Hand)
Lauren J. Belvin, Esquire (By Hand)
Byron F. Marchant, Esquire (By Hand)
John J. McDonnell, Esquire
David E. Hilliard, Esquire
Kathleen Abernathy, Esquire
Henry M. Rivera, Esquire
Larry S. Solomon, Esquire

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GURMAN, KURTIS, BLASK & FREEDMAN

CHARTERED

SUITE 500
1400 SIXTEENTH STREET, N.W.
WASHINGTON, D.C. 20036

LOUIS GURMAN
MICHAEL K. KURTIS
JEROME K. BLASK
WILLIAM D. FREEDMAN
DOANE F. KIECHEL
NADJA S. SODOS •

(202) 328-8200
TELECOPIER: (202) 462-1784

HERBERT C. HARRIS
LEONARD M. GARAVALLA
FRANK A. RONDINELLI
JAMES C. EGYUD
BRENT R. SHIREY
CONSULTING ENGINEERS

August 12, 1994

• NOT ADMITTED IN DC

Ralph A. Haller, Chief
Private Radio Bureau
Federal Communications Commission
2025 M Street, N.W., Room 5002
Mail Stop Code 1700
Washington, D.C. 20554

RECEIVED
AUG 12 1994
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: PR Docket No. 93-61
RM-8013

Dear Mr. Haller:

Southwestern Bell Mobile Systems, Inc. ("SBMS"), by its attorneys, hereby submits comments on an informal proposal made by the Commission's staff on August 8, 1994 to resolve two of the key issues in this proceeding, namely Part 15 interference and a Location and Monitoring Service ("LMS") band plan. The staff requested that any further comments on its proposal and related issues should be submitted by August 12, 1994.

SBMS appreciates the staff's efforts to reach a consensus on these two very contentious issues in this docket. While SBMS agrees in principle with the staff's recommendations concerning Part 15 interference, it strongly believes that the band plan must be changed. Of equal, if not greater, importance is that the Commission recognize the need to cancel all licenses for unbuilt facilities immediately upon release of the LMS Order and to require a short transition period for existing systems to comply with the new rules. No band plan should be adopted without direct reference to the Commission's ultimate decisions on grandfathering of systems already built or transitioning such systems to the new rules. These issues are inextricably tied and may not be resolved in isolation.

The staff has also indicated that it intends to use competitive bidding to grant "exclusive" wideband LMS licenses.

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Assuming that such licenses meet the legal criteria for auctions,^{1/} the Commission has an affirmative obligation under Section 309(j)(4)(B) of the Communications Act, as amended "to prevent . . . warehousing of spectrum by licensees or permittees and to promote investment in and rapid deployment of new technologies and services."^{2/} Adoption of the proposed band plan, particularly if coupled with grandfathering of non-compliant systems or a lengthy transition period, would be inimical to meeting these statutory goals and requirements.

As shown below, certain aspects of the proposed Part 15 interference thresholds require fine tuning. With regard to the proposed band plan, particularly the proposed allocation for only two 6 MHz wideband licensees to operate on an exclusive basis, SBMS urges the Commission to carefully reexamine the record. As presently proposed, the staff's band plan conflicts with the FCC's own stated competitive policy goals for LMS as well as the overwhelming weight of evidence already adduced in this proceeding concerning actual spectrum needs to provide a quality LMS service.

I. PART 15 INTERFERENCE

As SBMS understands the staff proposal on Part 15 interference, it consists of the following elements:

1. The status of the Part 15 industry vis a vis wide band AVM/LMS systems will essentially remain unchanged except vis a vis multilateration systems operating within the band 910-920 MHz;

2. Three specific benchmarks will be established to define those circumstances where the Commission will consider harmful interference from Part 15 devices to wideband AVM/LMS systems to exist:

- (a) in an outdoor environment, any Part 15 transmitter using an antenna 5 meters or more above ground level will be considered to be causing interference to wideband AVM/LMS systems;
- (b) any Part 15 transmitter using an antenna gain greater than 6 dBi will be considered to be

^{1/} See Implementation of Section 309(j) of the Communications Act -- Competitive Bidding, Second Report and Order, PP Docket No. 93-253, 75 RR2d 1 (1994).

^{2/} 47 U.S.C. §309(j)(4)(B).

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causing interference to wideband AVM/LMS systems and the interferer will be required to reduce transmitter output power below 1 watt; and

- (c) any Part 15 field disturbance sensor under Section 15.245 of the Rules which is located within either of the two proposed 6 MHz wideband AVM/LMS slots will be considered to be causing harmful interference to wideband AVM/LMS systems.

Though parties will always be free to achieve cooperative solutions to interference problems, in any of the three above-described circumstances, the Part 15 operator will have an affirmative obligation, enforced by the Commission, to correct the problem.

SBMS agrees with points (a) and (c) above, but believes that point (b) should be replaced with a benchmark which provides that any Part 15 transmitter operating above 1 watt ERP will be considered to be causing interference to wideband AVM/LMS systems and the interferer will be required to reduce power below that level. SBMS' suggested benchmark of 1 watt ERP simplifies the proposed rule by providing a more generic guideline and thus facilitates the ability of Part 15 designers, as well as the Commission, to judge compliance. The suggested threshold is approximately the level at which some current LMS devices transmit, and is well above most cordless phones and other personal Part 15 devices.

II. THE PROPOSED BAND PLAN MUST BE REEXAMINED TO SATISFY STATUTORY REQUIREMENTS AND THE COMMISSION'S LMS POLICY GOALS

A. Exclusivity of Wideband LMS Allocation

SBMS agrees that there should be "exclusive" frequency blocks assigned to wideband LMS operators. By "exclusive," SBMS means exclusivity as to other wideband LMS operators only. The band remains shared with other users. Wideband operators would, of course, remain subject to the primary users of the 902-928 MHz band: Federal Government Radiolocation, Fixed and Mobile services^{3/} and Industrial, Scientific and Medical ("ISM") devices under Part 18 of the Commission's Rules.^{4/} Such an "exclusive" allocation would still allow other noninterfering uses of the wideband spectrum on a secondary basis to LMS, such as Part 15 devices and

^{3/} 47 C.F.R. §2.106.

^{4/} 47 C.F.R. §18.305.

amateur radio operations under Part 97 of the Rules.^{5/} While the record amply supports the wisdom of exclusive wideband allocations,^{6/} as SBMS shows below, the manner in which the Commission's staff proposes to divide the spectrum must be reconsidered.

B. "Exclusive" Allocations Must Be Smaller To Conserve Scarce Spectrum and Promote Competitive Entry

In its NPRM^{7/} the Commission rejected the notion of assigning each wideband licensee the full 8 MHz in the interim 904-12 and 918-26 MHz bands and instead endorsed a "flexible approach" to "promote efficient spectrum use."^{8/} Moreover, the Commission stressed the need for "a competitive . . . environment in which [LMS] systems can continue to develop."^{9/}

It is SBMS' understanding that the staff is proposing a "2-6-10-6-2" plan, with the 2 MHz slots at either extreme designated for local area, non-multilateration narrowband LMS systems on a non-exclusive basis, the two 6 MHz slots designated for wideband multilateration LMS systems on an exclusive basis, and the 10 MHz slot in the middle for shared LMS use (with multilateration systems operating on a co-equal basis with Part 15 devices). In SBMS'

^{5/} 27 C.F.R. §97.301.

^{6/} See Letter from Robert L. Hoggarth to William F. Caton, Acting Secretary, FCC, dated February 2, 1994, transmitting a report entitled "Capacity and Interference Resistance of Spread-Spectrum Automatic Vehicle Monitoring Systems in the 902-928 MHz ISM Band" prepared for SBMS by the Mobile and Portable Research Group, Virginia Tech, and dated January 14, 1994, at 6-7 ("MPRG Report"); Comments of Southwestern Bell Mobile Systems, Inc., Declaration of Keith B. Rainer, Exhibit B (filed March 15, 1994); Reply Comments of Southwestern Bell Mobile Systems, Inc., Declaration of Keith B. Rainer, Exhibit A (filed March 29, 1994); Further Comments of MobileVision, L.P., 17-18 and n.12 (filed March 15, 1994) ("MobileVision Further Comments"); Comments of Location Services at 4 (filed June 29, 1994); Comments of North American Teletrac and Location Technologies, Inc., Engineering Analysis of Prof. Raymond Pickholtz, Appendix 1 (filed June 29, 1994).

^{7/} Notice of Proposed Rulemaking, PR Docket No. 93-61, 8 FCC Rcd 2502, 2505 (1993) ("NPRM").

^{8/} Id.

^{9/} Id. at 2503.

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meeting of August 8 with the staff, it appeared that the paramount consideration for proposing allocation of 6 MHz to each of two wideband operators was not spectrum efficiency or promotion of competition. Great weight appears to have been given to the fact that both MobileVision and Teletrac-- parties who have held licenses in hundreds of markets for years where their AVM spectrum has lain fallow-- claim that 6 MHz is necessary. The claim will not withstand scrutiny.

Beyond a substantial record which shows that an exclusive 6 MHz assignment is wasteful, SBMS invites the Commission's staff to take a field trip to Chicago in order to move the record beyond the parties' theoretical claims. Chicago is a market in which MobileVision, Teletrac and SBMS all have AVM systems. SBMS was the last of the three to obtain its license and holds the shortest implementation schedule: 20 months versus five years in the case of the other two. SBMS is only occupying 2 MHz of spectrum for its wideband operation with less than 50 kHz for its forward links. Beyond the small amount of spectrum necessary for forward links,^{10/} the record shows conclusively that Teletrac and MobileVision only need a wideband of 4 MHz or less for location service.^{11/} A trip to Chicago will amply demonstrate to the Commission that SBMS is accomplishing more with less spectrum.

While SBMS would prefer a band plan with four 4 MHz wideband slots, it would be content in the spirit of compromise to divide the same twelve MHz proposed for wideband operations by the staff into three 4 MHz slots. One of those slots could be divided in half, thereby leaving the proposed 10 MHz undisturbed in the middle. SBMS is prepared to apply, or bid if necessary, for that split spectrum.

- (i) MobileVision Wants An Additional 2 MHz For Extensive Voice and Data. The fact of the matter is that MobileVision is insisting on 6 MHz because it is attempting to mold LMS into its own pre-conceived business plan. It has previously made no secret of its desire to incorporate "unrestricted voice and high speed data capability to meet

^{10/} As discussed in further detail below, SBMS proposes that 250 kHz be assigned in separate exclusive spectrum to each wideband licensee which should be more than adequate to meet the location and monitoring needs of any current technology.

^{11/} See Reply Comments of Southwestern Bell Mobile Systems, Inc., Affidavit of Keith Rainer, 2-3 (filed July 29, 1993).

service needs."^{12/} Its claimed need for spectrum beyond 4 MHz to meet IVHS goals is spurious. Based on SBMS' own experience in Chicago where it operates with only 2 MHz, there is more than ample capacity within 4 MHz to meet IVHS goals.^{13/} Consistent with the Commission's original intent, LMS must remain primarily a non-voice service.^{14/} If someone wishes to construct and operate a fully interconnected voice system, then the FCC has created numerous opportunities for the purchase of spectrum specifically for that use.

- (ii) Teletrac Wants More Than 4 MHz As A Buffer For Unused Side Lobe Emissions. Teletrac's claim to more than 4 MHz is unrelated to its actual spectrum needs. Review of Teletrac's new sharing proposal makes it plain that its initial claim for an exclusive 8 MHz allocation bore little relationship to its actual spectrum needs. The Commission should now accord no greater credence to Teletrac's unsupported claim in staff discussions that 6 MHz is the magic number. Teletrac simply wants the additional bandwidth as a buffer for its unused side lobe emissions.
- (iii) Additional Bandwidth Is Not Necessary For Improving Location Capacity, Accuracy Or Interference Rejection. SBMS has shown that additional bandwidth is not necessary for improving location capacity, accuracy or interference rejection.^{15/}
- (iv) Spectrum Should Be Allocated For Forward Links. SBMS suggests that the Commission should allocate separate spectrum for forward links. The spectrum should be a minimum of 250 kHz per LMS system and should be as far from the wideband frequencies as practical. The forward links should also be

^{12/} Letter to Ralph Haller, Chief, Private Radio Bureau by counsel for MobileVision, dated February 1, 1994; see also MobileVision Further Comments, 15-17.

^{13/} See Rainer Declaration, 6-7 (filed March 29, 1994), at n.6, supra.

^{14/} NPRM at 2503.

^{15/} See Rainer Declaration, 6-7 (filed March 29, 1994) at n.6, supra, MPRG Report, 7,8.

"exclusive" of other AVM/LMS users, as "exclusive" as the wideband channels.

- (v) The Commission Should Carry Forward On Its Initial Policy Goals For LMS Favoring Competitive Entry. An important aspect of the public interest is promoting competition to the extent feasible and taking appropriate regulatory steps to insure that competition is fair.^{16/} As previously noted, the Commission recognized this guiding principle in its NPRM. By allocating two 6 MHz slots at the behest of two parties with inefficient technologies thereby potentially foreclosing market entry by those who are demonstrably more efficient, the Commission strays far from its own goal. The proposed band plan, which artificially limits the number of wideband LMS competitors to two when three or four is feasible, runs counter to the entire thrust of recent FCC policy which seeks to reward innovation and efficiency and promote competition.^{17/} When such a band plan is coupled with grandfathering of outmoded technologies or lengthy transition periods, it is difficult to discern how the public interest can possibly be served.

III. GRANDFATHERING AND TRANSITION PERIOD

In order to determine the impact of any band plan upon the opportunities for competitive entry, the Commission must consider the number of licenses with extended implementation schedules which it has already issued and the effect of grandfathering such license holders or affording them a lengthy period for transition to the new rules. As of August 8, 1994, ITS Inc. reported that Teletrac held 246 AVM licenses nationwide, many of which authorized construction of multiple locations. SBMS does not know whether this list accounts for all licenses held by Teletrac. There may be more.

^{16/} See National Ass'n of Regulatory Util. Comm's v. FCC, 525 F.2d 630, 636 and n.25 (D.C. Cir.) cert. denied, 425 U.S. 992 (1976).

^{17/} See In the Matter of Review of the Pioneer's Preference Rules and Amendment of the Commission's Rules to Establish New Personal Communications Services, Memorandum Opinion and Order on Remand, ET Docket No. 93-266 and GEN Docket No. 90-314, at 21 (August 9, 1994) ("Pioneer Preference Remand Order").

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As recently as June 29, 1994, the Commission was still granting Teletrac licenses (for example, WNRZ296, El Cajon and Claremont, California) under the interim AVM rules with extended 5 year implementation schedules. A number of licenses are duplicative in major markets and appear to trigger new 5-year implementation periods just when old ones are about to expire. For example, on May 16, 1990 the Commission granted Teletrac AVM licenses for Houston (WNSF945) and Miami (WNSF957). While these licenses will expire next year, on January 10, 1994, the Commission granted a new license for North Miami (WPBZ424) and on December 29, 1993, it granted a new license for Houston (WPBX298). Of the 246 licenses it holds-- many of which date back to 1989-- Teletrac has placed only six AVM systems into commercial operation.

MobileVision-- the other ardent advocate of an exclusive 6 MHz slot for wideband AVM (originally it claimed it could not do with less than 8 MHz)-- held 150 AVM licenses as of August 8, 1994, according to ITS. Many of the licenses have been held since 1990. Some of these licenses were granted as recently as April of 1993 (WNSB245, Delray Beach and Boca Raton, Florida, for example). Of the 150 licenses held, MobileVision claims three operational systems. The Chicago "system" includes but a single transmit antenna of such limited range as to make commercial operation unthinkable. SBMS on the other hand, just received its Chicago license-- which is currently its only license-- in 1994 and it is operating from seven transmitter locations. Since constructing its Chicago system, SBMS has filed applications for additional markets as it intends to participate in the industry on a broad basis.

In addition to Teletrac and MobileVision, Uniplex holds more than forty licenses for systems and built none, while Pinpoint holds many licenses but no system is in operation.

In its NPRM, the Commission addressed the issue of LMS construction periods as follows:

Currently LMS licensees must construct and place their systems in operation within eight months from the date the license is granted. [footnote omitted] . . . [W]e currently have no provision for extended implementation of radio systems that operate on shared channels, and we are not inclined to introduce such a concept in this service. [footnote omitted] . . . [W]e do not want frequencies to appear more congested than they really are because of licensees that do not construct. If we grant extended implementation, unconstructed licenses could remain active for up to five years rather than being cleared from the data

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base after eight months. Accordingly, we propose to retain the eight month construction and placed in operation requirement.^{18/}

SBMS believes that the Commission's analysis of construction periods is sound, and it would make little sense to require new operators under the new permanent rules to meet the stringent eight month requirement while grandfathering 5-year periods for licenses granted under the interim rules. In effect, an allocation of two 6 MHz slots for wideband LMS operators coupled with grandfathering would bestow a de facto monopoly or duopoly on Teletrac and MobileVision in many markets and forestall competitive entry nationwide for years. Moreover, it would allow the spectrum to lie fallow, while others seek to put it to productive use. Such results would defeat the Commission's intent in adhering to a stringent LMS construction requirement.

A. Requirements of Section 309(j)(4)(B) of the Act

If the Commission believes that an "exclusive" wideband LMS allocation (i.e. exclusive only as to each other wideband operator) can satisfy the "principal use" test of Section 309(j)(2) of the Act as well as other criteria,^{19/} then it may subject wideband licenses to competitive bidding. In the case of any such license,

^{18/} NPRM at 2507 (Emphasis added).

^{19/} Section 309(j)(2) limits the Commission's use of auctions, inter alia, to those initial licenses or construction permits for which the "principal use" of the spectrum "will involve, or is reasonably likely to involve, the licensee receiving compensation from subscribers." 47 U.S.C. §309(j)(2). In its Notice of Proposed Rulemaking in PP Docket No. 93-253, 75 RR2d 64 (1993) ("Auction NPRM"), the Commission stated that there were "fundamental questions" concerning application of auctions to AVM:

[I]t appears that because AVM frequencies are shared with the government, which is primary in this band, the principal use of these frequencies might not be for the provision of service to subscribers for compensation, as required by Section 309(j). Id. at 89, n.153.

The deferral of these "fundamental questions" was maintained in the Commission's Second Report and Order in PP Docket No. 93-253, 75 RR2d 1 (1994) pending further action in the instant docket.

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the Commission must develop performance benchmarks "to prevent . . . warehousing . . . and to promote investment in and rapid deployment of new technologies and services."^{20/} In its Second Report and Order, the Commission stated it was "unnecessary" to impose additional performance requirements because "existing performance requirements, in conjunction with the requirement that licensees pay for spectrum use, should be adequate to prevent the warehousing of spectrum and ensure fair competition and the prompt delivery of service [footnote omitted]."^{21/} Presumably, under permanent LMS rules, that would mean the eight month construction period proposed in the NPRM. Ostensibly this would satisfy the requirements of Section 309(j)(B)(4) in an auction regime. Under no circumstance, however, could the Commission possibly reconcile grandfathering warehoused spectrum licenses or lengthy transition periods with the requirements of the Act.

B. Licenses For All Unbuilt Facilities Must Be Cancelled Upon Release Of The LMS Order

Though SBMS has filed for LMS authorizations in additional markets, it has done so with full knowledge that any licenses granted under the interim rules are subject to the outcome of this rulemaking proceeding. As the Commission forewarned in the NPRM, "[A]ll AVM licenses should be aware that final rules adopted may require any licensee, regardless of the type of system [or] frequencies that the system operates on, to modify its operations." Id. at 2507. The same standard must apply to all LMS licensees. Licenses for all unbuilt facilities must be cancelled upon release of the LMS order.

C. The Transition Period For Constructed Facilities Must Be One Year

In the interest of moving this proceeding forward, SBMS would be willing to vacate its existing 918-920 MHz assignment in Chicago within one year of adoption of a new band plan which provided at least three 4 MHz assignments. As previously noted, one of those 4 MHz assignments could be split spectrum. All current LMS operators should be required to migrate to the band allocated in the Commission's final order within the same time frame.

^{20/} 47 U.S.C. §309(j)(4)(B).

^{21/} Second Report and Order at 45.

IV. COMPETITIVE BIDDING

If the Commission proceeds with a competitive bidding regime, it must clear the spectrum. Just recently the Commission retroactively required winners of pioneer preferences to pay for their licenses lest "the entire bidding process . . . [become] distorted by awarding a pioneer's preference recipient a license without payment requirements [footnote omitted]." The Commission further stated that:

Providing licenses to preference winners for free would give a financial advantage to some competitors without any public interest benefit. We believe such action would disserve important public policy objectives.^{22/}

The same competitive policy objectives which led the Commission to require payment from spectrum innovators in an auction regime certainly require at a minimum the tender of LMS licenses where the spectrum has lain fallow for years. If the LMS spectrum's most productive use is to be determined through competitive bidding, then the public and prospective bidders are entitled to have that spectrum cleared.

V. LICENSING AREAS

For reasons previously stated, SBMS prefers licensing MSAs and RSAs; however, licensing on a BTA basis would also be workable. The BTAs are more manageable areas than MTAs from a construction standpoint. In order to comply with the performance requirements of Section 309(j)(4)(B) of the Act, however, the Commission will have to develop specific buildout rules which are compatible with markets of this size. While eight months might be suitable for a few transmitting sites, a phased schedule for construction beyond that level would appear more appropriate in markets of this size. MTAs are simply too large for this service. They would necessitate liberal build out requirements, extended implementation and encourage fallow spectrum.

VI. VOICE SERVICES MUST BE STRICTLY LIMITED TO A TRULY ANCILLARY FUNCTION

Under the final LMS rules, voice must be kept as a truly ancillary function or it will be abused. The Commission should restrict communications to a channel between the mobile unit and a single point of contact, such as an emergency response team.

^{22/} Id. at 11.

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Direct access to the Public Switched Telephone Network should be prohibited. Finally, the Commission should consider the fact that allowing a liberal use of voice on LMS frequencies may have an unwanted collateral effect by depressing the value of narrowband and broadband PCS spectrum.

VII. TECHNICAL SPECIFICATIONS

A. Mobile Transmitted Power

The maximum transmitted power level from an LMS/AVM mobile operating on "exclusive" wideband systems should be 50 W ERP.

B. Fixed Site Transmitted Power

The maximum transmitted power from an "exclusive" LMS/AVM fixed site should be 500 W ERP.

C. Out of Band Emissions

- (i) Mobiles. For the mobile transmitted out of band specification, the following is proposed:

"Out of band transmissions for LMS Mobiles. The mean power of emissions shall be attenuated below the maximum permitted output power of the mobile transmitter in accordance with the following schedule: For LMS systems, operating in the 902-928 MHz band, in any 4 kHz band, the center frequency of which is removed from the center of the licensed location sub-band by more than 50 percent up to and including 250 percent of the licensed bandwidth, as specified by the following equation but in no case less than 45 dB:

$$A = 35 + 0.7 (P-50) + 10 \log B \text{ (attenuation greater than 80 dB is not required)}$$

where A = attenuation (in decibels) below the maximum permitted mean mobile output power level,

P = percent removed from the center of the licensed band,

B = licensed bandwidth in megahertz."

- (ii) Fixed Sites

A specification is required for the spread spectrum transmissions, i.e. the "calibration or timing" pulses, from the fixed sites. It is desirable that

the effective out-of-band interference levels should be about the same as those from the mobiles. The specification for the out-of-band transmissions for the fixed sites needs to be tighter than that for the mobiles because the interference effect will be greater due to the height of the antenna. The effective gain due to antenna height is approximately $10 \log H$, where H is the antenna height in feet ($H > 30\text{ft}$). For antenna heights 100 - 500 feet, therefore, the effective gain is 20 - 27 dB. It is proposed that the specified out-of-band attenuation for the fixed sites is therefore 20 dB greater than that for the mobiles.

The following specification is proposed:

"Out of Band emissions for LMS Fixed Sites. The mean power of emissions shall be attenuated below the maximum permitted output power of the mobile transmitter in accordance with the following schedule: For LMS fixed locations, where the antenna is more than 30 feet above the mean ground level, operating in the 902 - 928 MHz band, in any 4 kHz band, the center frequency of which is removed from the center of the licensed location sub-band by more than 50 percent up to and including 250 percent of the licensed location bandwidth, as specified by the following equation:

$$A = 45 + 0.7 (P-50) + 10 \log B \text{ (attenuation greater than 90 dB is not required)}$$

where A = attenuation (in decibels) below the maximum permitted mean mobile output power level,

P = percent removed from the center of the licensed band,

B = licensed bandwidth in megahertz."

VIII. CONCLUSION

The Commission's staff is to be congratulated for its tireless efforts in this difficult proceeding. While the wideband incumbents who hold hundreds of licenses nationwide have lobbied hard to garner a protected status through assignment of large spectrum blocks (6 MHz) and grandfathering and lengthy transition periods, the Commission should resist the temptation to simply prolong the status quo as the path of least resistance. The Commission's competitive and spectral efficiency goals for LMS

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announced in the NPRM have not changed since April of 1993. Whether LMS spectrum is ultimately auctioned or not, the Commission must provide the public with the opportunity to reap the benefit of meaningful competition.

Respectfully submitted,

SOUTHWESTERN BELL MOBILE SYSTEMS, INC.

By: Wayne Watts (ly)
Wayne Watts V.P. - General Attorney

Southwestern Bell Mobile Systems, Inc.
17330 Preston Road, Suite 100A
Dallas, Texas 75252

By: Louis Gurman
Louis Gurman

Gurman, Kurtis, Blask & Freedman,
Chartered
1400 Sixteenth Street, N.W., Suite 500
Washington, D.C. 20036

Its Attorneys